

Comments from Sept 10, 2012 Meeting			
Date:	Name/Organization:	Comment:	Email:
5-Oct	Lillian	the thing I love about union station, is that when you look down that long coodirr (I'm thinking where you took the shot actually) you can see the dip marks where the benches used to be, where years and years peoples' feet would swing. it's like looking back to the past, ghost world almost. And the ceiling? spectacular.-Sadie	fernando.silva@bcr.com.br
22-Oct	Marie Birnbaum	<p>The preferred alternative of two unobtrusive pairs of escalators looks harmless enough. However, the idea of moving LED lights on the proposed pylons seems too flashy for historic Union Station. The Main Hall's Center Cafe is a terrible eyesore in the Main Hall, and it should be removed.</p> <p>The overall experience with holes in the ground or floor in the Capitol Hill area has been difficult. The 1976 "Visitors' Center" hole in Union Station's floor had to be filled in fairly soon after it was dug out. The more recent change to the landscaping and plaza of the East Front of the Capitol has left two hideous gashes in the ground and an ugly plaza in place of what was a lovely, intimate landscape enjoyed by people from the neighborhood and the world.</p> <p>Union Station is busy, beautiful, and important. Escalators in the Main Hall should be as unobtrusive as possible. The preferred alternative of two unobtrusive pairs of escalators looks harmless enough. However, the idea of moving LED lights on the proposed pylons seems too flashy for historic Union Station.</p> <p>The Main Hall's Center Cafe is a terrible eyesore in the Main Hall, and it should be removed.</p> <p>The overall experience with holes in the ground or floor in the Capitol Hill area has been difficult. The 1976 "Visitors' Center" hole in Union Station's floor had to be filled in fairly soon after it was dug out. The more recent change to the landscaping and plaza of the East Front of the Capitol has left two hideous gashes in the ground and an ugly plaza in place of what was a lovely, intimate landscape enjoyed by people from the neighborhood and the world.</p> <p>Union Station is busy, beautiful, and important. Escalators in the Main Hall should be as unobtrusive as possible.</p>	mariebirnbaum@verizon.net

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Date:	Name/Organization:	Comment:	Email:
24-Oct	Dan Malouff -Beyond DC and Greater Washington	<p>First, let me commend you for rethinking the original 2010 design proposal. This one is much better. Union Station's Main Hall is one of the most beautiful and best civic spaces in Washington, so we must be very careful not to overwhelm its wonderful Beaux Arts finishes with clashing modern designs. I was very worried about punching holes in the floor for escalators, but I think your solution will work. Good going!</p> <p>Second, please rethink the LED signs. They are undignified and their modern design clashes with the room. I like the idea of having a vertical element there, and don't mind if it incorporates signs, but the design you've put forth is all wrong. It would be much better to replace those LED poles with a historic-style iron lamp, and then affix a fabric or metal sign to it. Something like this: http://commons.wikimedia.org/wiki/File:Taft_Bridge_-_lamp_post.JPG</p> <p>Thanks again for taking comments from 2010 into consideration and rethinking the design. What you have now is much better. But it could still be a little better, so please change the signs!</p> <p>First, let me commend you for rethinking the original 2010 design proposal. This one is much better. Union Station's Main Hall is one of the most beautiful and best civic spaces in Washington, so we must be very careful not to overwhelm its wonderful Beaux Arts finishes with clashing modern designs. I was very worried about punching holes in the floor for escalators, but I think your solution will work. Good going!</p> <p>Second, please rethink the LED signs. They are undignified and their modern design clashes with the room. I like the idea of having a vertical element there, and don't mind if it incorporates signs, but the design you've put forth is all wrong. It would be much better to replace those LED poles with a historic-style iron lamp, and then affix a fabric or metal sign to it. Something like this: http://commons.wikimedia.org/wiki/File:Taft_Bridge_-_lamp_post.JPG</p> <p>Thanks again for taking comments from 2010 into consideration and rethinking the design. What you have now is much better. But it could still be a little better, so please change the signs!</p>	dan@beyonddc.com
24-Oct	matthew linsky - Georgetown university law center	The garish signage next to the escalators are out of place. A better solution should be available to achieve the same purpose.	
24-Oct	Derek Torrey - DC Resident & Union Station patron	I think the new design proposal is a vast improvement over the alternatives presented last year. However, I'm concerned that the proposed escalator cuts still look a bit too modern--most specifically the LED towers. I think they would look incredibly garish in the very traditional Beaux Arts space. Perhaps look toward doing something that will blend better with the architecture (i.e. dark wood, gold lettering, something of that nature). I also wonder if the glass railing around the escalator cuts might be better if they were built with more traditional materials. I don't doubt the need for the escalator cuts, and support their inclusion, but I think more attention should be paid to selecting a design that harmonizes with the original architecture of the space.	
24-Oct	Mary Yarnall - citizen	I work on Capitol Hill and use the Union Station Barnes & Noble book store regularly. What is to be gained by evicting them from the Union Station complex? They are always busy and a useful retail establishment. Will B&N ever come back?	mcyarnall@gmail.com

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Date:	Name/Organization:	Comment:	Email:
24-Oct	Mark Eckenwiler - local resident	<p>This design is a significant improvement over previous proposals. In general, the new design better respects the grandeur of the Main Hall and avoids much of the fussiness (and jarring excess) of the options put forward in 2011.</p> <p>That said, the new proposal is deficient in two respects:</p> <p>1) The vertical pylons are completely inappropriate in design, materials, and profile, and should be abandoned altogether. Directional signage for the lower level would be far better located on the glass railing/enclosure for the escalators, where it would not intrude upon (or compete so violently with) the historic interior.</p> <p>2) The information desk seems too understated and inconspicuous. Even if modular construction is planned (in order to facilitate removal for private Main Hall functions), the desk should be more prominent. Ideally, this would include a lateral frame (at a height of 7.5-8 feet) allowing for a more readable horizontal "INFORMATION" sign in preference to the hard-to-read vertical signs depicted in the current design. With proper dimensions, such a frame would not unduly obstruct the general sight line from the central entrance portal to the Amtrak sign on the north wall. (Minor obstruction would not seem to be a valid concern, given that the Amtrak signage would not in any event be readable at that distance.)</p>	anc@eckenwiler.org
24-Oct	John Mitchell	The design is generally not awful, with the exception of that disastrous signage pylon ruining the whole space. Stick that out at Dulles if you want to, but not at Union Station. Alternatives 12a,b and d would all be far better. The pylons are far more intrusive than the horizontal elements of those alternatives.	johnamitchell@gmail.com
24-Oct	Michael Aiello	<p>No LED towers! Think of what you want to see when you take a picture of the space. What do you want to see when you arrive, when you depart. We don't those garish LED signs all over the internet when people google search "Union Station".</p> <p>One of the variations of proposal 12 would be better. Perhaps something like the Metro canopies here in DC or Paris.</p> <p>About me: I am a graphic designer and have an architectural background.</p>	thechorp@gmail.com
24-Oct	Thoreau Bartmann	Please don't eliminate center cafe! It is a wonderful gathering spot for lunch or after dinner drinks and a real asset to the station. I work near the station and go there at least once a week. Also the signs to the shops are awful.	thoreau@gmail.com
24-Oct	Joe Winslow - Nat'l Association of Regional Councils	The vertical signs are tacky. A good clean design otherwise that respects the historic character of the space.	jsw3865@gmail.com
24-Oct	Anonymous	Proposal took steps in the right direction with the exception of the signage coming out of the escalators. What a disgrace to that space. Stick to something period-appropriate.	

Comments from Sept 10, 2012 Meeting			
Date:	Name/Organization:	Comment:	Email:
24-Oct	Muneer Ahmad	I think the pylons are awful. They are completely incongruous with the architecture of the Great Hall. I think it\'s great to play with modern elements in a traditional setting, but the pylons are gawdy. The only pylons I can think of that \'work\' are those situated around LAX, and even those are an acquired taste.	muneer.ahmad71@gmail.com
25-Oct	Gary Malasky	I think there needs to be a taller element in the middle and it should not be of a commercial nature. The signs for the businesses below are too tall. The observation deck with the two stairs is very graceful. If the sign in the middle were removed and transparent materials were used, that might work if the two floor penetrations were moved further to the sides, and similar transparent materials were used.	gmalasky@malaskyproperties.com
25-Oct	Melissa Esposito - resident	The overall idea of the vertical signs to direct people is fine, but those LED ones are GOD-AWFUL. They add nothing but garishness to a gorgeous Beaux Arts space, and clash terribly. Please, for the love of all that is beautiful, come up with something else to do the same thing. A set of decorative wooden posts with carved letters on it, maybe, or lightposts with changeable fabric banners to rotate as needed or with the seasons? But NOT anything electronic. It ruins the whole aesthetic.	melissa.esposito@gmail.com
25-Oct	Paul Reber - American University	Why is it that we continue to allow banal economic considerations effect decisions about this building, and many of our other great rail stations? I can\'t help but look at the historical photographs in your presentation with a sense of melancholy. We should put the benches back in the hall the way they were in 1920 and find some place else to put those awful escalators. The signs are even worse and will significantly disrupt Burnham\'s design for the space.	reberpc@gmail.com
26-Oct	Mitchell Polman - DC Resident	I think the loss of the cafe is terrible. It adds character to the place and is an excellent place to relax and watch the world go by.	mpolman@earthlink.net
29-Oct	Charles W. McMillion	As I said at the Sept. 10 meeting, I appreciate the progress made from earlier proposals. However, the proposed, two 30 foot LCD billboards towering above the main floor -- and in the lower lower level -- are totally unacceptable for this space. Even from the narrow perspective of my consumer experience, these enormous LCD advertising screens would so cheapen the current beauty of the building that it would dramatically reduce my incentive to walk over for shopping or walk in on my way to/from the metro or train. Unless your goal is to transform the Union Station shopping experience into a \'Times Square\' type downscale tee shirt mall, you would be very foolish to turn off serious consumers with such abusive advertising towers.	cwcmillion@gmail.com
30-Oct	Jeffrey Struski	I live in Capitol Hill and have been a resident of Washington, DC for most of my adult life. I disagree with any plan that doesn\'t include some kind of restaurant/bar/lounge area in the center space where the Center Cafe sits today. It has always been a people friendly gathering place where locals sit alongside travelers from all over the world. It is the Capitol City\'s living room that blends a sense of community with a space to sit and view the historic architecture of the hall. This is the kind of space that other mass transit and community spaces strive for, and it should not be removed. Without such a cafe, the space turns into a cold, uninviting, sterile place that can no longer be enjoyed by the public, which is the opposite of everything a public space should be. It should not be treated as a walkthrough, it should be viewed as a national treasure. I hope you find a way to keep or incorporate a new center cafe into your plans. It\'s always been my favorite	jstruski@gmail.com
		space in the District.	

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Date:	Name/Organization:	Comment:	Email:
1-Nov	Graham W. Jenkins	The closer any design brings us to Burnham\'s original vision of Union Station, the better. Eliminating the Center Cafe - which currently interrupts sightlines and features a private trolley operator instead of any kind of useful information booth - is an excellent start. I think most, however, would prefer that access to the lower levels be removed from the walking path of the main hall. As presented, these escalators significantly disrupt normal pedestrian flow throughout the hall, as does the cafe seating towards the ticket hall (and this is before even mentioning the retail like Godiva that has been a nightmare in obscuring passenger flow towards the trains - which, after all, is the raison d\'etre of Union Station).	grahamwjenkins@gmail.com
		But especially garish, if we are truly stuck with the final proposal, are the two \'Shops\' signs. Their neon coloring and presumably LED faces would look more at home in Times Square or on the side of the Verizon Center. Surely a more suitable replacement can be found, one that better fits the grandeur and style of Union Station. I personally would prefer one of the lattice/trellis constructs featured in earlier proposals, but if the poles are a must, then they could at least echo the columns of the station\'s portico, or the nearby streetlights. It is my sincere hope that the USRC will reconsider at least this portion of the proposal, if not the entire premise of cutting yet more holes in the floor (again, the \'mall\' beyond has just been a tremendous waste of space and made the actual experience of rail travel far more miserable and cramped than it should be). Many thanks for your consideration.	
13-Nov	Geoffrey Hatchard - Citizen	Please do not let the pylons (with "SHOPS" on them in the presentation graphics) come to fruition. They are hideous.	hatchard@gmail.com



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

November 15, 2012

**Ms. Beverley K. Swaim-Staley
President and CEO
Union Station Redevelopment Corporation
Ten G Street, N.E., Suite 504
Washington, D.C. 20002**

Dear Ms. Swaim-Staley:

The National Trust for Historic Preservation appreciates the opportunity to share the following comments regarding proposed changes to the iconic Union Station building in Washington, DC. Union Station is a nationally significant historic place and the current proposals for large-scale redevelopment present a welcome opportunity to restore the publicly owned building's majesty and central transit function.

In our view, it is imperative that any changes to the historic Main Hall be considered within the larger framework of comprehensive planning for Union Station, which includes the Amtrak-Akridge July 2012 master plan, changes contemplated by WMATA, and the Union Station Redevelopment Corporation's own master plan. Before further development of Ashkenazy's Main Hall concept takes place, we respectfully request that USRC should direct Ashkenazy to demonstrate that the alterations to the Main Hall and lower level of the historic rail station, as proposed by Ashkenazy, would not foreclose on options presented in the July 2012 master plan. It would be a serious error, in our view, to proceed with changes to the historic Main Hall which would foreclose future opportunities to preserve the historic character and enhance the efficiency of Union Station.

In its June 2012 letter outlining the assessment of effects for the proposed Main Hall project, the Federal Railroad Administration (FRA) outlines four reasons for the proposed changes: to improve (1) station access; (2) circulation and orientation; (3) access to the lower level; and, (4) financial viability. The FRA goes on to state that the proposed changes would "support a solid revenue stream that will ensure the future viability and continued preservation for the next generation."

The National Trust supports the proposed removal of the Center Café, the central planters, and the retail kiosks from the design. These proposed changes would dramatically improve circulation in the Main Hall and help return the Hall to its original function as a transit and orientation area. The National Trust continues to oppose the penetration of the Main Hall floor to allow escalator access to the lower level.

Floor Removal, Escalators and Signage

We agree with the FRA's assessment that the Main Hall floor penetrations, the installation of escalators, the partial obstruction of the spatial volume of the Main Hall, and the obstruction of historic views constitute an Adverse Effect on Union Station.

Washington Field Office

1785 Massachusetts Avenue NW Washington, DC 20036

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Although we oppose damaging the Main Hall floor, we appreciate the attempts of the Union Station Redevelopment Corporation to minimize the size of the openings, to avoid disrupting historic material, and to locate the escalators away from the central axes of the Main Hall.

If the FRA and USRC decide to move forward with the current Ashkenazy proposal, we recommend that, in general, everything possible be done to minimize the scale and visual impact of the Ashkenazy design. We encourage the USRC to re-evaluate the pylon signage concept in Alternative 12f alongside the more traditional signage option featured in Alternative 12e, so that the visual and spatial impacts of each can be fully understood and compared. In Alternative 12f, for example, the pylon itself should be minimized as much as possible, as the pylon at its proposed height would interfere with views within the station and would introduce a new and, we think, incompatible vertical element within the station's primary historic space. We appreciate the USRC's offer to share mock-ups of the proposed pylon on site and hope to participate in that consultation meeting. We also recommend that both static light options and moving light options be evaluated in the course of review.

Mitigation

Actions that would adversely affect historic Union Station should come with substantial mitigation to help offset the adverse effects of those actions. In general, we support the mitigation options outlined in the FRA's June 2012 letter; however, we note that removing the Center Café and the planters also helps to achieve one of the project's primary goals – circulation and station access. In particular, we wish to highlight the following recommendations for mitigation.

- **Reversibility.** The National Trust believes that the proposed changes to the Main Hall, including the new access from the Main Hall to the lower level of the historic building, should be reversible. We would strongly support the future removal of the escalators and restoration of the Main Hall floor, and request that USRC work with the DC Historic Preservation Office, the Advisory Council on Historic Preservation, and consulting parties to determine an appropriate timeframe for removal and/or specific actions or circumstances that would trigger removal. The commitment to reversibility, timeframe, and triggers should be documented in the Memorandum of Agreement.
- **Preservation Plan.** In addition to the mitigation options presented by the FRA, we request that the USRC prepare a preservation plan for Union Station, which would provide a conditions assessment and recommendations for ongoing maintenance and restoration. (Please see the Union Station Preservation Coalition's recommendation for a preservation plan for Union Station in the coalition's August 2012 publication, "A Golden Opportunity to Re-Invest in Historic Union Station.")

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**National Trust *for*
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Save the past. Enrich the future.

- **Preservation Fund.** Since the FRA has identified a relationship between the commercial viability of the station's lower level and ongoing preservation work, we request that a percentage of additional retail revenue be returned to the USRC and applied toward the necessary preservation work that would be identified in the Union Station preservation plan. The specific terms for the establishment of a Preservation Fund should be documented in the Memorandum of Agreement.

Thank you for considering the views of the National Trust for Historic Preservation.

Sincerely,

A handwritten signature in black ink that reads "Rob Nieweg".

Robert Nieweg
Field Director and Attorney
Washington Field Office

cc: David Valenstein, Federal Railroad Administration
Brian Harner, Amtrak
David Tuchmann, Akridge
Louise Brodnitz, Advisory Council on Historic Preservation
David Maloney, DC Historic Preservation Office
Andrew Lewis, DC Historic Preservation Office
David Zaidain, National Capital Planning Commission
Thomas Luebke, US Commission on Fine Arts
Rebecca Miller, DC Preservation League
William Wright, Committee of 100 on the Federal City
Shauna Holmes, Capitol Hill Restoration Society

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WASHINGTON DC CHAPTER

National Railway Historical Society

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Union Station Redevelopment Corporation
Ten G Street NE, Suite 504
Washington, DC 20002

RE: Union Station Section 106 Consultation
September 10 Consulting Party Meeting Comments

October 23, 2012

Dear Union Station Redevelopment Corporation:

Thank you for the continued opportunity to participate in the Union Station Section 106 process for the alterations to Union Station's Main Hall. With this letter, we are sending our comments in regards to the Preferred Design Alternative presented at the Consulting Parties Meeting on 10 September 2012.

The Preferred Design Alternative presented at that meeting shows the continued application of considerable study and design effort which has evolved the proposed design into a solution that comfortably fits Daniel Burnham's grand Main Hall. We feel this design proposal is significantly improved over the previous one presented a year ago, and respects the overall historic architectural aesthetic of Union Station's Main Hall, while accommodating an evolving building complex meeting today's needs. We support the design presented, with the following areas of concern offered for your consideration.

1. Comprehensive, Unified Station Complex Signage and Wayfinding System

In our September 7, 2011 letter we commented on the need for a Comprehensive Signage and Wayfinding system in the entire Union Station building complex. We will not repeat the totality of that information here but our concern remains substantially the same as we are not clear from the presentation if the new plan fully addresses our earlier-stated concerns. If the goal is to improve traffic flow throughout the complex and improve the economic vitality of Union Station, a comprehensive system of well-designed signs, fitting within the historic context while meeting modern cultural expectations and applied consistently throughout all of Union Station remains an element critical to the success of this project.

2. Cultural Resource / Heritage Awareness of Union Station

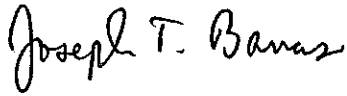
In our September 7, 2011 letter we commented on the importance of including "limited museum exhibits" as suggested in the original 1985 MOU. We feel these exhibits would help to explain why the station is a special place and are deserving of your support. The September 10 presentation references interpretive

October 12, 2012
Letter to Union Station Redevelopment Corporation
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exhibits as a potential mitigation; we support this initiative and would be pleased to participate and consult in the preparation of those displays. We have access to a substantial body of knowledge about the station and Washington, D.C. railroad heritage and access to world-class expertise that could contribute significantly to the effort's success.

Please let me know if you have questions concerning our comments. Thank you very much for your time and consideration.

Sincerely yours,

A handwritten signature in black ink that reads "Joseph T. Banas". The signature is written in a cursive style with a large initial "J".

Joseph T. Banas, Ph.D.
President



November 15, 2012

Ms. Beverly K. Swaim-Staley, President
Union Station Redevelopment Corporation
Ten G Street, NE, Suite 504
Washington, DC 20002

Dear Ms. Swaim-Staley:

The DC Preservation League (DCPL) would like to thank you for the opportunity to provide comments regarding the proposed changes to the Great Hall of Union Station. This iconic building is nationally significant and with a continuing increase in rail traffic is reclaiming its historic status as the gateway to Washington.

The assessments of effects letter, submitted by the Federal Railroad Administration (FRA) on June 25, 2012, for the proposed Great Hall project outlined four reasons for the proposed changes: to improve (1) station access; (2) circulation and orientation; (3) access to the lower level; and, (4) financial viability.

The letter's explanation of why the criteria of adverse effect were found applicable does not seem to be supported by the information available. While the project team looked at "twelve design options over the course of two years", little evidence has been presented to indicate that alternate routes to access the retail spaces below the Great Hall were seriously studied. Only a clear case eliminating the viability of alternatives would demonstrate a genuine effort to avoid penetrations of the Great Hall floor. Avoidance of adverse effect is the first principle of the Section 106 process under the National Historic Preservation Act.

The FRA letter further asserts that the penetrations to the floor are necessary to "support a solid revenue stream that will ensure the future viability and continued preservation for the next generation." While there may be little doubt that increased access to areas beneath the Great Hall would increase the income generating potential of the space, there does not seem to be any connection between that increased income and the revenue stream available for the maintenance and improvement of the station. The space may be more valuable with increased access, but no case has been made that it has no value without the access proposed. In fact, with a large part of the lower level space currently vacant the retail operation continues to be profitable according to a statement made by Barry Lustig of the Ashkenazy Acquisition Corporation (Ashkenazy) at the September 2012 Section 106 Consulting Party Meeting.

The DC Preservation League supports the proposed removal of the Center Café and the central planters. These proposed changes would dramatically improve circulation in the Great Hall and help the space return to its original function as a transit and orientation area. We also acknowledge that the removal of the café, taken independently, will cause a reduction in lease income that deserves to be addressed. However, no information has been presented to indicate the extent to which the proposed changes to the retail configuration of the Great Hall, and the proposed penetrations there, will increase lease income and how that increase compares to the loss of the current café. While it might be reasonable to consider

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D. Peter Sefton | Chuck Wagner



changes to Union Station that would allow Ashkenazy to replace the income lost by the removal of the café, it should not be necessary to financially reward them for making this change.

Maximizing the income from the subleases in the station is an understandable goal for Ashkenazy as the retail developer, but should not be the goal of FRA or the Union Station Redevelopment Corporation (USRC). The proposed floor penetrations of the Great Hall, to say nothing of the sign obelisks, are an adverse effect. Access alternatives need to be thoroughly investigated in terms of compensating for the loss of the café income, not in terms of maximizing overall retail profit. DCPL cannot, at this point with the information made available to us, support the cuts in the floor of the Great Hall and the obelisk signs rising from them.

Finally, DCPL would like to remind the USRC that the Union Station Redevelopment Act of 1981 “Directs the Secretary of Transportation to **rehabilitate and redevelop** the Union Station complex **primarily as a multiple-use transportation terminal** and, **secondarily, as a commercial complex**, in accordance with specified goals.”

Until such time that a preservation plan for the historic station and a master plan for the complex (including transportation functions) be devised, no action should progress that would further compromise the historic structure in a negative way.

Sincerely,

Rebecca Miller
Executive Director

The Committee of 100 on the Federal City



www.committeeof100.net

November 15, 2012

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Ms. Beverley Swaim-Staley, President
Union Station Redevelopment Corporation
10 G Street, N.E., Suite 504
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Dear Ms. Staley,

The Committee of 100 on the Federal City appreciates the opportunity to comment, as part of Section 106 review, on the September 10, 2012, proposal for alterations to the Main Hall at Union Station. As the District of Columbia's leading nonprofit planning organization, the Committee of 100 has for 90 years dedicated itself to protecting the values established by the L'Enfant Plan and the McMillan Commission and to responding to the special challenges of development in the nation's capital. Our goal is to improve the quality of life for visitors and residents alike.

Union Station truly deserves the label "landmark." It is a glorious, monumental building created by a master architect. More than a century after its opening, it remains a center of economic and social activity in Washington. Any alterations to it must consider its enduring importance to the city and the country.

Based on the information currently provided, the Committee of 100 cannot support the preferred design alternative. This plan does offer one highly beneficial change, the removal of the Center Café, which is ugly, disruptive to the architecture, and a major obstruction for travelers. However, the troubling aspects of the preferred alternative overwhelm those benefits. Cutting new holes in the Main Hall floor would not only be a drastic change to the historic arrangement of that room, but it would do irreparable harm. For such an action, we must weigh this high price with any potential benefits to the building. Unfortunately, despite repeated requests, the plan fails to provide adequate information about crucial elements: how the new arrangements will financially benefit and support the ongoing preservation of the station; how the much-needed way-finding system will improve circulation; and how this project will fit into the long-overdue master plan for the station and its surroundings. Additionally, despite the negative impact of this proposal as submitted, the applicant has failed to provide for mitigation measures that adequately balance the harm to the building with the ongoing stewardship of nationally significant landmark.

Problems with the Proposed Design

The Committee of 100 fully supports the decision to remove the current Center Café. That structure disrupts what should be glorious architectural features of the headhouse, the main axes flowing both north/south and east/west and a marvelous, voluminous space. It also impedes visitors as they move between the front doors and the retail areas and obscures the way to train ticketing and waiting areas.

Removing the Café will bring the Main Hall much closer to the monumental, inspiring room that Daniel Burnham and his chief designer Peirce Anderson created at the start of the 20th century. Its elimination will also support what the station's 2010 master plan recognized as its primary purpose: transportation. It will be much easier for travelers to find and reach the trains, as well as Metro and, in the coming years, the proposed addition of buses and streetcars.

Despite these benefits, the preferred alternative's overall effect seriously damages the station's historic architecture. This wound results primarily from the two cuts in the northern section of the Main Hall floor that would allow escalators to carry visitors down to basement-level retail. The preferred alternative claims the escalators are vital for bringing shoppers downstairs—even though that area can be reached easily by stairs and escalators only a few feet away.

The injury produced by the cuts is compounded by “light columns” that would beckon visitors to the lower level shops from between each set of escalators. These triangular towers, which would rise from the basement to 30 feet above the main hall floor, would have on their faces thousands of light emitting diodes that could be animated, rather like the scoreboard at a football stadium. While this style of signage can be appropriate in many situations, it is an unnecessarily distracting bit of theater for Union Station and matches no existing elements.

Important Information Gaps in the Current Proposal

A troubling aspect of the entire Section 106 process has been the ongoing failure to provide crucial information. The Draft Assessment of Effect, released in August, argues that there is a "need" for these alterations to keep the station "economically viable" or even for the station to "survive." Nowhere, however, does that document provide any supporting analysis on the economic condition of the station (considered by most to be thriving), even though consulting parties made a request for those numbers more than a year ago. Nor does the proposal indicate exactly how this action would specifically benefit the preservation and ongoing stewardship of the station. Without such detail, one can only conclude that the financial benefit will accrue only to the developers, not to the station or its users.

There is a similar shortage of information about the proposed wayfinding system. Everyone involved in the Section 106 process has agreed that the system for directing people around the building should be much better. At the September hearing, the light columns were presented as the first element of the wayfinding system. Even though another month has passed, there has been no additional information shared with the public as to how this will relate to an overall program. That failure makes it impossible to judge the value of the new approach.

The failure to develop a master plan—or even launch a process to develop such a plan—is also an enormous concern. In their comments in both 2010 and 2011, multiple consulting parties called for an integrated master plan

for the station and the surrounding area. The need for this coordinated approach is now even greater since Amtrak and Akridge released their “master plan” for the station and its air rights this July. The Committee of 100 continues to believe that it would be precipitous to entertain the current design alternative without it being placed in a comprehensive context that includes forecasted growth in Metro, Amtrak, and bus traffic at the station as well as the introduction of the H Street trolley, and the Burnham Place development. USRC has for several years acknowledged the need for a comprehensive planning process. As the trustee of Union Station and its rich heritage, it must show how each major change will integrate with current and future plans for the building. No work should begin on the Main Hall until those effects have been made clear.

The Severe Shortcomings of the Proposed Mitigation

Given all the factors already discussed, it seems premature to discuss mitigation measures extensively, but it is clear that the steps presented this September are insufficient. In general, they are not mitigation—that is, creative compensations for significant features that would be lost if the current proposal is enacted. Instead, they are projects that serve the station’s existing operating needs, promises that would carry no force of law, or efforts that should have been undertaken long ago.

Providing a way-finding program and removing planters are simply logical actions that would make the Main Hall function better under any plan. While it would be laudable to nominate Union Station as a National Historic Landmark, this is a purely honorific designation, carrying with it no legal protections. Most disingenuous is the proposal to make a preservation plan as a mitigation measure when, in fact, the DC SHPO requested such a plan more than two years ago.

In conclusion, the Committee of 100 is encouraged by the widespread interest in keeping Union Station at the center of our community. Proposals for improving use of the Main Hall offer an exceptional opportunity to start a process that will ensure that Union Station will remain not just a landmark building for the next 100 years, but one that operates efficiently, serves a useful purpose, and enriches the experience of commuters, travelers, tourists and residents alike. Unfortunately, this proposal does not meet that standard. We look forward to working with you to do so.

Sincerely,



George R. Clark
Chair



Stephen J. Gardner
Vice President

NEC Infrastructure & Investment Development

November 15, 2012

Ms. Beverley Swaim-Staley, President and CEO
Union Station Redevelopment Corporation
10 "G" Street, N.E.
Suite 504
Washington, DC 20002

Re: SECTION 106

Dear Ms. Swaim-Staley:

Amtrak appreciates the opportunity to provide input to the Section 106 process for modifications to the main hall at Union Station. We particularly appreciate the work of both the Union Station Redevelopment Corporation and Union Station Investco to coordinate this important project with appropriate public input and participation from affected Union Station users. We understand the importance of well-considered input in the process, and are writing this letter to inform you of additional information about the proposed plans we would like to have as a part of providing our formal comments.

Beginning in 2011, Amtrak had the opportunity to work with USI, USRC, and the Federal Railroad Administration in the consideration of the USI design proposals for vertical circulation and other changes to the main hall. This resulted in a proposal for the removal of the center cafe in the main hall, and the introduction of two new "portals" in the floor of the main hall to provide space for escalators to access station areas located below the main hall. Amtrak's input during this process included comments regarding the location and size of the portals, the provision of seating in the main hall, retail and transportation signage, the location of other retail in the main hall, and utilization of floor area for circulation, seating, and other uses including information and Traveler's Aid.

Since 2011 when Amtrak began working with USRC and USI to consider and provide input on the proposed changes to the main hall, we have completed the first phase of our master plan framework for the growth of the region's transportation hub at Union Station. Significantly, our work on the master plan has identified necessary changes and improvements to the track and platform layout of the station and public circulation through both the new concourses created in the master plan, as well as the existing concourses and the historic building. The importance of the public circulation scheme identified in the master plan is its necessity in connecting the multiple transportation modes serving Union Station: rail, Metro, bus, taxi, streetcar, automobile, and pedestrian. The circulation system identified in the master plan is the critical framework that will enable growth in rail and transit capacity over the next decades.

Because of our continuing work on the master plan, we have come to further understand the importance of coordinating any changes to the retail and circulation framework of the existing facility with the master plan. We have also come to better understand immediate impacts to station facilities and circulation that has occurred with the introduction of intercity buses to the station. While Amtrak supports many elements of the USI proposal, we would like to better understand the interaction of the proposal with the future circulation and facilities changes that will be required to ensure the transportation capacity of the station. Specifically, more information and coordination of the following would be important



to the success of both the proposed retail improvements and the transportation improvements envisioned in the master plan:

a.) proposed lower level floor level: what floor levels are proposed for the new spaces below the main hall and will these levels align with the circulation framework in the master plan? Will the new floor levels be compatible with the integrated north-south circulation shown in the master plan?

b.) provision of "back-of-house" spaces: as change is implemented in the retail and transportation functions of the station, demand for increased restroom areas, as well as mechanical and electrical rooms, storage areas, egress corridors and stairs, and loading and other support spaces will increase. What is the demand being created by the new space and is adequate support space being considered?

c.) accessibility: does the proposal adequately address ADA and universal access issues?

d.) ability to connect public spaces on the lower level to future parking and transit: will circulation corridors be preserved where needed on the lower level?

e.) fire and life safety: what are the proposed population numbers on the lower level and what egress capacities and routes are being planned? Where will egress stairs be located and where will they connect with their required exits?

f.) parking: what demand for additional parking spaces will be created in developing the lower level? Is there adequate parking for both retail and transportation functions?

g.) removal of the portals in the future: we are pleased that removal of the portals in the future is one of the mitigation measures proposed and we support this. We want to ensure that this can be coordinated to occur when needed, and that when removed the circulation system will be compatible with the new circulation on the lower level developed in accordance with the master plan, and that the new vertical circulation connecting the two levels will be able to be revised in order to accommodate connections to the new Central Concourse and future parking below Columbus Circle.

We remain confident that the proposed project can have many benefits for the overall function of Union Station, and look forward to coordinating the above issues with you.

Regards,

A handwritten signature in blue ink, appearing to read "Stephen J. Gardner". The signature is stylized and fluid.

Stephen J. Gardner
Vice President

CAPITOL HILL RESTORATION SOCIETY

P.O. Box 15264 Washington, DC 202.543.0425

November 15, 2012

Ms. Beverley Swaim-Staley, President
Union Station Redevelopment Corporation
Ten G Street, NE, Suite 504
Washington, DC 20002

Dear Ms. Swaim-Staley:

The Capitol Hill Restoration Society (CHRS) appreciates the opportunity to comment on the September 10, 2012, proposal for alterations to the Main Hall of Union Station. As we noted in our initial comment letter, Union Station is one of Washington's great buildings, not only for its setting and architecture, but also for the magnificent interior spaces of the Main, East, and West Halls and the historic Concourse, all of which so dramatically convey the early- to mid-20th-century experience of travel.

We agree with the Federal Railroad Administration that penetrating the floor of the Main Hall with two openings for pairs of escalators to and from the downstairs retail constitutes an adverse effect on the majestic Main Hall. CHRS has maintained for over two years that any proposed alterations should restore the original unobstructed views of the Main Hall and eliminate, or at the very least substantially reduce, impediments to the flow of pedestrians through the space. We believe the best way to achieve these goals would be to remove the Center Café, as well as existing planters and retail kiosks, and not install escalators so that pedestrians can move freely and unimpeded through the Main Hall in all directions and easily see where they're going. We also advocate removing retail from the Main Hall and designing and placing such needed items as the information kiosk and seating in such a way that they create minimal impediments to pedestrian circulation and allow visitors to fully experience more of the original intention of the stunning and dramatic Hall. Wayfinding would be much easier if and when the Main Hall and colonnaded passages are unobstructed by retail, cafes, kiosks, pylons, and other physical and visual clutter. CHRS remains opposed to penetrating the Main Hall floor for escalator access to the lower level.

As noted by a number of persons at the September 10 consulting parties meeting, the current proposal with two sets of escalators wrapped by short glass safety enclosures is a great improvement over both the intrusive and inappropriate initial proposal and the mid-2011 proposal. Along with others, CHRS too is glad the idea of a raised central café has been eliminated, along with the earlier proposed elevators and the luxury modular units. However, it is inescapable that removing substantial pieces of the Main Hall floor to insert two sets of escalators still introduces significant obstacles to pedestrian circulation and changes the historic nature and experience of the Hall. With the expected large increases in visitors to the Station, it seems counterproductive and short-sighted to remove three obstacles (Center Café and planters) and then add two more. As the State Historic Preservation Office (SHPO) and others have noted, re-establishment of the north-south and east-west pedestrian axes is crucial to recapturing both more efficient pedestrian movement and unobstructed sight lines.

Should USRC and FRA choose to move forward with installing the escalators, every effort should be made to minimize their size, scale, and profile. While CHRS appreciates efforts made to date to scale down the design of the current proposal, with the short, transparent escalator surrounds, we find the soaring pylons with moving LED lights proposed between the escalators to be totally incompatible with the Main Hall in materials, appearance, form, scale, and movement. Even with their relatively narrow profile, they extend much too high and intrude far too much into the spatial volume of the historic Hall. Their out-of-character, colored, moving lights would distract pedestrians from the grand architecture and are completely unacceptable. We recommend that USRC continue to explore signage options, in consultation with SHPO and other consulting parties such as CHRS, to identify alternatives and compare their effects and appropriateness. CHRS is very interested in signage and wayfinding throughout the Station, especially in its historic portions, and looks forward to seeing possibilities and, if feasible, a mock-up of the proposed pylons and other possibilities.

Mitigation

Given the considerable adverse effects the proposal would have on this historic icon, the mitigation measures also need to be considerable and, to the maximum extent possible, directly mitigate the adverse effects. While CHRS generally supports the mitigation measures proposed in FRA's June 2012 letter, the Assessment of Effect, and the September 2012 consulting parties meeting, we note that some of them further the project's goals (removal of the Center Café and planters will expedite circulation and access) or have been ignored since being called for by consulting parties over two years ago to guide this project and others (preparation of a Historic Preservation Plan for Union Station). Accordingly, we offer the following key observations and recommendations regarding project mitigation for consideration and inclusion in the Memorandum of Agreement.

- Removal of the Center Café is crucial to restoring the full spatial volume of the Main Hall, and along with removal of the planters will greatly expedite pedestrian flow.
- A Historic Preservation Plan, as recommended from the outset by SHPO, ACHP, NCPC, and other consulting parties, ideally would have been completed by now to guide this project and other planned and potential projects. We recommend a commitment to prepare one, along with establishment of a timetable for its review and completion, and we encourage engaging the Union Station Preservation Coalition in the review and comments.
- One of the most important mitigation measures is the provision for reversing the escalator installations and restoring the Main Hall floor. CHRS strongly supports this measure and recommends that the MOA include a timeframe for removal and/or clearly defined measures, actions, or circumstances that would serve to trigger such removal and restoration.
- Because the 1985 MOA needs to be updated, the MOA for the current project should stipulate development by time certain of a Programmatic Agreement to guide restoration, rehabilitation, maintenance, and commercial development of and in the Station. The PA should retain the critical heart and essence of the 1985 MOA, including that all preservation work meet the Secretary of the Interior's Standards for Rehabilitation, and that major entrances to the historic

spaces provide the building user with an opportunity to view, understand, and experience the grandeur of the space (Stipulations 1,2 & 3.f.).

- The 1985 MOA includes a provision (Stipulation 2) requiring that interior work meet the Secretary of the Interior's Standards for Rehabilitation. While this was intended to guide interior restoration, we suggest that it would not be inappropriate for the escalator project to meet the Standards, since it proposes to undo the floor restoration that was carried out in accordance with the MOA.
- The 1985 MOA also requires in Stipulation 3.a. that design criteria be developed and applied for interior redevelopment installations, including signs and kiosks. While this MOA no doubt did not anticipate future floor penetrations for escalators in the Main Hall with tall lighted pylons, neither should its provisions be ignored. Assuming that such design criteria were developed, we wonder whether the current proposal – which is intended for interior redevelopment purposes – meets those criteria. If no such criteria exist, or if existing criteria need updating for current needs, we recommend that the MOA require them, or their update, and that they be applied to this project.
- The Selection of Preferred Design Study in the Assessment of Effects asserts that the existing elevator will be made more visible and accessible, with more effective signage. We recommend that this commitment be included in the MOA.
- The Assessment of Effect asserts that “The commercial viability of the station is inextricably linked to its success as an inter-modal transportation hub. Only if Union Station is commercially sustainable can it continue to operate as a transportation terminal.” This is tied to the need for the Main Hall escalators because the lower level’s “function as commercial and retail space necessitates more points of entry and a stronger visual connection to the first floor.” In other words, no escalators = insufficient commercial success to keep the station operating. However no sufficiently persuasive evidence has been produced to convince us that without the escalators, the retail would not succeed. Although USRC’s October 31, 2012, letter to the DC Preservation League (DCPL) broadly asserts that the proposed changes would benefit “Union Station itself through an increase in funding available to USI to handle the day-to-day operations, maintenance, insurance, and repairs of the Station”, no specific evidence has demonstrated exactly how improved commercial success would equate to additional revenue dedicated to maintenance, repair, and restoration, and to what degree. While the letter says USRC and Ashkenazy jointly contribute to the Capital Maintenance Reserve Fund for repair and restoration of historic fabric and other structural Station needs, it does not affirmatively state that increased profits resulting from the expanded escalator access would increase the level of Ashkenazy’s contributions.

Except for removal of the Center Café and planters and potential later removal of the escalators, no proposed measure directly and physically mitigates the adverse effects on the Main Hall. We ask that the MOA stipulate that a designated measure of increased profits be made available for maintenance, repair, renovation, and restoration of historic portions of Union Station so the harmed historic Main Hall will directly benefit from the project’s anticipated commercial success.

- We suggest that the MOA provide for SHPO to work with USRC to develop and prioritize a list of restoration-related capital improvements.

- CHRS fully supports preparation and submission of a National Historic Landmark nomination for Union Station; preparation of a brochure on the historic of the Station; and preparation of an interpretive exhibition program.

CHRS looks forward to seeing drafts of the MOA and providing comments on its stipulations.

Sincerely,

Shauna Holmes

Shauna Holmes
Chair, Historic Preservation Committee

Cc: David Maloney, DC SHPO
Andrew Lewis, DC SHPO
Louise Brodnitz, ACHP
Nell Ziehl, National Trust for Historic Preservation
Rebecca Lewis, DC Preservation League
John Sandor, DC Preservation League
Erik Hein, Committee of 100 on the Federal City
William Wright, Committee of 100 on the Federal City
Thomas Luebke, Commission of Fine Arts
David Zaidain, NCPC
David Valenstein, Federal Railroad Administration
Lisa Klimko, Union Station Redevelopment Corporation
Emily Eig, Traceries